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IT IS SO ORDERED.

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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

June 22, 2022

RIVER CHIROPRACTIC AND) CASE NO 1:20-CV-00688-BMB
WELLNESS CENTER, LLC,) CASE NO 1.20-C V-00088-BMB
WELLNESS CENTER, LLC,) JUDGE BRIDGET MEEHAN BRENNAN
Plaintiff,) JODGE BRIDGET MEEHAN BRENNAN
,) DEFENDANT BANKROLL CAPITAL,
VS.) INC.'S MOTION FOR ATTORNEYS'
) FEES
BANKROLL CAPITAL, INC.,)
Defendant.)

Pursuant to Federal Rule of Civil Procedure 37(c)(1) and 37(c)(2), Defendant Bankroll Capital, Inc. ("Bankroll") moves the Court for an award of attorneys' fees against Plaintiff and Plaintiff's counsel, Frederick & Berler LLC (and its attorneys of record), owing to Plaintiff's denial of a material request for admission and/or Plaintiff's false and materially incomplete discovery responses.

A Memorandum in Support is attached.

Respectfully submitted,

/s/ David M. Krueger

DAVID M. KRUEGER (0085072) JOHN N. DAGON (0098128)

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